

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

PATRICK BRADY, et al.,	)	
	)	
Plaintiffs,	)	HONORABLE JOSEPH E. IRENAS
	)	
v.	)	Civil Action No. 02-2917 (JEI)
	)	
AIR LINE PILOTS ASSOCIATION,	)	
	)	
Defendant.	)	

***AFFIDAVIT OF ALLEN PRESS***

1. I am a shareholder of the law firm Green Jacobson, P.C. in St. Louis, Missouri. My firm was appointed by the Court to serve as co-Class Counsel for Plaintiffs in this action. This Affidavit is based upon my personal knowledge.

2. By Order dated September 22, 2011, the Court granted Plaintiffs' Motion for Sanctions Pursuant to Rule 11, and ordered Plaintiffs' counsel to submit affidavits detailing the legal fees and costs incurred in bringing the Motion for Sanctions and defending the Motion to Revoke the *Pro Hac Vice* Admission of Certain Counsel within 14 days.

3. This Affidavit is submitted in support of my firm's application for an award of attorneys' fees in accordance with the Court's Order dated September 22, 2011, and pursuant to L.Civ.R. 54.2.

4. I have been the lawyer primarily responsible for this case in my office since we were appointed as Class Counsel in 2006, and I was lead counsel at the trial. Joe Jacobson and Lisa Rodriguez second-chaired the case with me.

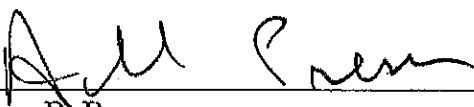
5. My firm spent 20.5 hours preparing Plaintiffs' Motion for Sanctions Pursuant to Rule 11, and responding to Defendant's Motion to Revoke the *Pro Hac Vice* Admissions.

6. The total billable time spent by my firm working on these two motions is \$6,350. This total was reached by multiplying the total number of attorney hours (20.5) by the hourly rate charged by each attorney.

7. My current billing rate is \$300 per hour. Mr. Jacobson's current rate is \$350 per hour. These are the rates at which we charge most of our hourly clients, of which we have many. These rates are significantly less than the rates charged by lawyers from similar litigation firms with national practices that handle complex litigation.

8. Contemporaneous time records are attached hereto as Exhibit A (Allen Press) and Exhibit B (Joe Jacobson). The attached records include a detailed description of work performed by the attorneys in preparing the Rule 11 motion, and also responding to Defendant's Motion to Revoke the *Pro Hac Vice* Admissions. I spent 16.5 hours working on the motions. Mr. Jacobson spent four hours working on the motions. Some of the entries in the time records include work performed on subjects not related to the two motions at issue. That time was not included in the calculations reflected above.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Allen P. Press

State of Missouri                    )  
  ) SS  
County of St. Louis                )

On this 6<sup>th</sup> day of October in the year 2011 before me, Petrina M. Bailey, a Notary Public in and for said state, personally appeared Allen P. Press, known to me to be the person who executed the within Affidavit, and acknowledged to me that he executed the same for the purposes therein stated.

Petrina M Bailey  
Notary Public

My Commission Expires:



Oct/ 5/2011

Green Jacobson, P.C.  
Client Fees Listing  
From Aug/ 1/2011  
Working Lawyer

Page: 1

Date	Entry #	Fee / Time Explanation	Hours	Amount	Inv#	Billing Status
B-106 TWA Pilots						
B-106-001 Airline Pilots Association (ALPA)						
Aug/10/2011	224974	Lawyer: APP 1.50 Hrs X 300.00 Research; telephone conference with co-counsel; review post-trial motions from defendant;	1.50	450.00		Unbilled
Aug/11/2011	224975	Lawyer: APP 6.00 Hrs X 300.00 Review post-trial motions; draft motion for sanctions;	6.00	1800.00		Unbilled
Aug/13/2011	224978	Lawyer: APP 7.50 Hrs X 300.00 Work on sanctions motion;	7.50	2250.00		Unbilled
Aug/16/2011	224979	Lawyer: APP 2.50 Hrs X 300.00 Telephone conference with potential expert; draft sanctions motion;	2.50	750.00		Unbilled

Sep/12/2011	226139	Lawyer: APP 7.00 Hrs X 300.00 Work on responses to defendant's post-trial motions;	7.00	2100.00		Unbilled
Sep/22/2011	226142	Lawyer: APP 2.50 Hrs X 300.00 Prepare for and attend hearing on sanctions motion;	2.50	750.00		Unbilled

Unbilled: 117.25 35175.00  
Billed: 0.00 0.00  
Total: 117.25 35175.00  
Percent Billed: 0.00 0.00

## \*\*\* Summary by Working Lawyer \*\*\*

Working Lawyer	Hours				Fees			
	Unbilled	Firm %	Billed	Firm %	Unbilled	Firm %	Billed	Firm %
APP - Allen P. Pr	117.25	100.00	0.00	100.00	35175.00	100.00	0.00	100.00
Firm Total	117.25	100.00	0.00	100.00	35175.00	100.00	0.00	100.00

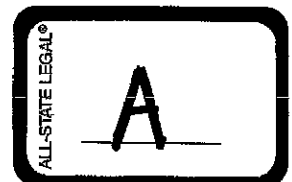
## \*\*\* Summary by Responsible Lawyer \*\*\*

Responsible Lawyer	Hours				Fees			
	Unbilled	Firm %	Billed	Firm %	Unbilled	Firm %	Billed	Firm %
MMG - Martin M. G	117.25	100.00	0.00	100.00	35175.00	100.00	0.00	100.00
Firm Total	117.25	100.00	0.00	100.00	35175.00	100.00	0.00	100.00

## REPORT SELECTIONS - Client Fees Listing

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From Aug/ 1/2011  
B-106-001



Oct/ 5/2011

Green Jacobson, P.C.

Client Fees Listing

From Aug/ 1/2011

Page: 2

Date	Fee / Time	Hours	Amount	Inv#	Billing
Entry #	Explanation	Working Lawyer			Status
	Clients	All			
	Major Clients	All			
	Client Intro Lawyer	All			
	Matter Intro Lawyer	All			
	Responsible Lawyer	All			
	Assigned Lawyer	All			
	Type of Law	All			
	Select From	Active, Inactive, Archived Matters			
	Matters Sort by	Default			
	New Page for Each Lawyer	No			
	Firm Totals Only	No			
	Client balances only	No			
	Matter balances only	No			
	Entries Shown - Billed Only	Yes			
	Entries Shown - Unbilled	Yes			
	Entries Shown - Billable Tasks	Yes			
	Entries Shown - Write Up/Down Tasks	Yes			
	Entries Shown - No Charge Tasks	Yes			
	Entries Shown - Non Billable Tasks	Yes			
	Working Lawyer	app			

Green Jacobson, P.C.  
Client Fees Listing  
Aug/ 7/2011 To Sep/22/2011  
Working Lawyer

Date	Entry #	Fee / Time Explanation	Hours	Amount	Inv#	Billing Status
	B-106	TWA Pilots				
	B-106-001	Airline Pilots Association (ALPA)				
Aug/18/2011	224472	Lawyer: JDJ 0.50 Hrs X 350.00 Conference with APP re ALPA filings; review and revise demand letter to Fram;	0.50	175.00		Unbilled
Aug/20/2011	224473	Lawyer: JDJ 1.50 Hrs X 350.00 Revising brief in support of Rule 11 motion for sanctions;	1.50	525.00		Unbilled
Sep/20/2011	225996	Lawyer: JDJ 1.00 Hrs X 350.00 Receipt and review of Fram's additional filings;	1.00	350.00		Unbilled
Sep/22/2011	226007	Lawyer: JDJ 1.00 Hrs X 350.00 Court appearance via telephone for hearing on motion to revoke pro hac vice status;	1.00	350.00		Unbilled
			Unbilled:	18.05	6317.50	
			Billed:	0.00	0.00	
			Total:	18.05	6317.50	
			Percent Billed:	0.00	0.00	

## \*\*\* Summary by Working Lawyer \*\*\*

Working Lawyer	Hours				Fees			
	Unbilled	Firm %	Billed	Firm %	Total	% Bld	Unbilled	Firm %
JDJ - Joe D. Jacobson	18.05	100.00	0.00	100.00	18.05	0.00	6317.50	100.00
Firm Total	18.05	100.00	0.00	100.00	18.05	0.00	6317.50	100.00

## \*\*\* Summary by Responsible Lawyer \*\*\*

Responsible Lawyer	Hours				Fees			
	Unbilled	Firm %	Billed	Firm %	Total	% Bld	Unbilled	Firm %
MMG - Martin M. G	18.05	100.00	0.00	100.00	18.05	0.00	6317.50	100.00
Firm Total	18.05	100.00	0.00	100.00	18.05	0.00	6317.50	100.00

## REPORT SELECTIONS - Client Fees Listing

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Matter Intro Lawyer All  
Responsible Lawyer All  
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Select From Active, Inactive, Archived Matters  
Matters Sort by Default  
New Page for Each Lawyer No  
Firm Totals Only No  
Client balances only No  
Matter balances only No  
Entries Shown - Billed Only Yes  
Entries Shown - Unbilled Yes  
Entries Shown - Billable Tasks Yes  
Entries Shown - Write Up/Down Tasks Yes  
Entries Shown - No Charge Tasks Yes  
Entries Shown - Non Billable Tasks Yes  
Working Lawyer JDJ

